

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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NCMIC INSURANCE COMPANY,	)	
	)	
Plaintiff,	)	
	)	
	)	
v.	)	No. 08 C 885
	)	
Bradley Hayashi, Hanover Park Physical	)	JUDGE CONLON
Medicine & Rehabilitation, Ltd. and Melina Kelley,	)	MAGISTRATE JUDGE COX
Defendants.	)	

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**ANSWER TO COMPLAINT AT LAW**

NOW COMES the Defendant MELINA KELLEY, by and through her attorneys, K. MORRIS HOFFER, P.C., and states as follows:

**PARTIES**

1. Defendant Kelley neither admits nor denies the allegations contained in paragraph one, but demands strict proof thereof.
2. Defendant Kelley neither admits nor denies the allegations contained in paragraph two, but demands strict proof thereof.
3. Defendant Kelley admits the allegations contained in paragraph three.
4. Defendant Kelley admits the allegations contained in paragraph four.
5. Defendant Kelley admits the allegations contained in paragraph five.
6. Defendant Kelley neither admits nor denies the allegations contained in paragraph six, but demands strict proof thereof.
7. Defendant Kelley admits the allegations contained in paragraph seven.

8. Defendant Kelley admits the allegations contained in paragraph eight.
9. Defendant Kelley admits the allegations contained in paragraph nine.
10. Defendant Kelley admits the allegations contained in paragraph ten.
11. Defendant Kelley admits the allegations contained in paragraph eleven.
12. Defendant Kelley admits the allegations contained in paragraph twelve.
13. Defendant Kelley admits the allegations contained in paragraph thirteen.
14. Defendant Kelley admits the allegations contained in paragraph fourteen.
15. Defendant Kelley admits the allegations contained in paragraph fifteen.
16. Defendant Kelley admits the allegations contained in paragraph sixteen.
17. Defendant Kelley admits the allegations contained in paragraph seventeen.
18. Defendant Kelley admits the allegations contained in paragraph eighteen.
19. Defendant Kelley admits the allegations contained in paragraph nineteen.
20. Defendant Kelley admits the allegations contained in paragraph twenty.
21. Defendant Kelley admits the allegations contained in paragraph twenty-one.
22. Defendant Kelley admits the allegations contained in paragraph twenty-two.
23. Defendant Kelley admits the allegations contained in paragraph twenty-three.
24. Defendant Kelley neither admits nor denies the allegations contained in paragraph twenty-four, but demands strict proof thereof.
25. Defendant Kelley neither admits nor denies the allegations contained in paragraph twenty-five, but demands strict proof thereof.
26. Defendant Kelley neither admits nor denies the allegations contained in paragraph twenty-six, but demands strict proof thereof.
27. Defendant Kelley neither admits nor denies the allegations contained in paragraph

twenty-seven, but demands strict proof thereof.

28. Defendant Kelley neither admits nor denies the allegations contained in paragraph twenty-eight, but demands strict proof thereof.

29. Defendant Kelley neither admits nor denies the allegations contained in paragraph twenty-nine, but demands strict proof thereof.

30. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty, but demands strict proof thereof.

31. THERE APPEARS TO BE NO PARAGRAPH 31 IN THE COMPLAINT. However, Defendant Kelley neither admits nor denies the allegations contained in the paragraph marked "e.", but demands strict proof thereof.

32. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-two, but demands strict proof thereof.

33. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-three, but demands strict proof thereof.

34. Defendant Kelley admits the allegations contained in paragraph thirty-four.

### **COUNT I**

35. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-five, but demands strict proof thereof.

36. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-six, but demands strict proof thereof.

37. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-seven, but demands strict proof thereof.

38. Defendant Kelley neither admits nor denies the allegations contained in paragraph



thirty-eight, but demands strict proof thereof.

39. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-nine, but demands strict proof thereof.

#### **COUNT II**

40. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-five (sic), but demands strict proof thereof.
41. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-six (sic), but demands strict proof thereof.
42. Defendant Kelley denies the allegations contained in paragraph thirty-seven (sic).
43. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-eight (sic), but demands strict proof thereof.

#### **COUNT III**

44. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-five (sic), but demands strict proof thereof.
45. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-six (sic), but demands strict proof thereof.
46. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-seven (sic), but demands strict proof thereof.
47. Defendant Kelley admits the allegations contained in paragraph thirty-eight (sic).
48. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-nine (sic), but demands strict proof thereof.

#### **COUNT IV**

49. Defendant Kelley neither admits nor denies the allegations contained in paragraph

thirty-five (sic), but demands strict proof thereof.

50. Defendant Kelley admits the allegations contained in paragraph thirty-six (sic).

51. Defendant Kelley admits the allegations contained in paragraph thirty-seven (sic).

52. Defendant Kelley admits the allegations contained in paragraph thirty-eight (sic).

53. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-nine (sic), but demands strict proof thereof.

#### **COUNT V**

54. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-five (sic), but demands strict proof thereof.

55. Defendant Kelley admits the allegations contained in paragraph thirty-six (sic).

56. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-seven (sic), but demands strict proof thereof.

#### **COUNT VI**

57. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-five (sic), but demands strict proof thereof.

58. Defendant Kelley admits the allegations contained in paragraph thirty-six (sic).

59. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-seven (sic), but demands strict proof thereof.

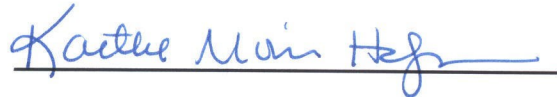
#### **COUNT VII**

60. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-five (sic), but demands strict proof thereof.

61. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-six (sic), but demands strict proof thereof.

62. Defendant Kelley neither admits nor denies the allegations contained in paragraph thirty-seven (sic), but demands strict proof thereof.

WHEREFORE, Defendant MELINA KELLEY respectfully prays for judgment in her favor and against the Plaintiff.



Attorney for Defendant MELINA KELLEY

Kaethe Morris Hoffer  
ARDC: 6243121  
kmh@morrishoffer.com  
K. Morris Hoffer, P.C.  
1609 Sherman Avenue  
Evanston IL 60201  
(847) 424-0700